

Attorney Docket No.: SAM-0538
Application Serial No.: 10/776,053
Reply to Office Action of: July 12, 2005

REMARKS

It is noted, with appreciation, that the Advisory Action dated September 23, 2005 indicates that the Amendment After Final previously submitted by Applicant on September 9, 2005 will be entered. Accordingly, the above listing of claims is inclusive of the amendments submitted for consideration on September 9, 2005. More specifically, claims 18, 21, and 25 are reproduced above to include the amendments submitted on September 29, 2005 and now entered.

Claims 1-4 and 12-33 are pending in the present application. Claim 29 is amended above. No new matter is added by the claim amendments. Entry of the amendment is respectfully requested.

The Applicant notes, with appreciation, that page 2, last line, of the Advisory Action indicates that claims 1-4 and 12-28 are allowed.

Applicant appreciates Examiner Joannie Garcia's granting of a telephone interview that was held on October 26, 2005 at 2:30 P.M. Participants included Ms. Garcia, Mr. George Fourson (Examiner Garcia's Primary Supervisory Examiner), and Anthony Onello (Attorney for Applicant). During the interview, it was agreed that the Chien, *et al.* reference fails to teach or suggest a method of manufacturing a capacitor including a primary wet treatment using an etchant containing SC1 and a secondary wet treatment using an etchant containing H₂SO₄ that are both performed on an "entire upper surface" of a lower metal electrode. Accordingly, it was suggested that claim 29 be revised to reflect this feature.

Claim 29 is amended above in a manner that is believed to clearly distinguish the present invention as claimed in claim 29 over Chien, *et al.* More specifically, claim 29 is amended to state that both the primary wet treatment and the secondary wet treatment are applied to the "entire upper surface" of the lower metal electrode. Reconsideration and removal of the rejection of independent claim 29, and allowance of the claim, are therefore respectfully

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requested.

With regard to the rejection of claim 32, it is submitted that this claim should inherit the allowability of claim 29, from which it depends. Allowance of claim 32 is respectfully requested.

With regard to the rejection of claims 30, 31, and 33 over the combination of Chien and Lee, it is submitted that Lee likewise fails to teach or suggest "performing a primary wet treatment on an entire upper surface of the lower metal electrode to remove unwanted surface oxides from the surface of the lower metal electrode, wherein the primary wet treatment is performed using an etchant containing SC1," as claimed in claims 30, 31, and 33. In view of this, since the Chien and Lee references fail to teach or suggest the claimed features set forth in independent claim 29, there is no way to combine the references to obtain such teaching or suggestion of the claimed features, and therefore, there is no combination of the references that teaches or suggests the invention set forth in claims 30, 31, and 33. Claims 30, 31, and 33 are therefore believed to be allowable over the cited references. Accordingly, reconsideration of the rejections of claims 30, 31, and 33 under 35 U.S.C. 103(a) based on Chien and Lee, and allowance of the claims, are respectfully requested.

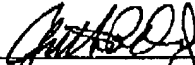
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Closing Remarks

It is submitted that all claims are in condition for allowance, and such allowance is respectfully requested. If prosecution of the application can be expedited by a telephone conference, the Examiner is invited to call the undersigned at the number given below.

Respectfully submitted,

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